

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION**

UNITED STATES OF AMERICA

CRIMINAL ACTION NO. 15-0070

VERSUS

JUDGE ELIZABETH E. FOOTE

LATRENTON D. WASHINGTON

MAGISTRATE JUDGE HORNSBY

MEMORANDUM ORDER

Before the Court is a motion filed by Defendant Latrenton D. Washington ("Washington"). Record Document 54. The filing is only one page long and contains just one sentence, which reads: "I am the defendant in the above mentioned case, respectfully asking that my case be reviewed under the new ruling by the Supreme Court in *Davis*." *See id.* Washington does not provide any additional information or argument.

On April 8, 2016, Washington pleaded guilty to two counts: (1) possession with intent to distribute a mixture or substance containing a detectable amount of marijuana, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D); and (2) possession of a firearm in furtherance of a drug trafficking crime, in violation of 18 U.S.C. § 924(c)(1). *See* Record Documents 1 & 45. The Court sentenced Washington to a total of 66 months imprisonment and three years of supervised release. *See* Record Document 49 at 2-3.

Regardless of how the Court interprets Washington's request for relief, he is not entitled to any relief. While Washington's motion does not specify which *Davis* case he intends to refer to, *United States v. Davis*, 588 U.S. 445 (2019), is the most related in

substance to Washington's crimes of conviction.¹ In *Davis*, the United States Supreme Court held that the residual clause found at 18 U.S.C. § 924(c)(3)(B), relating to crimes of violence only, was unconstitutionally vague. 588 U.S. 445. Washington's 18 U.S.C. § 924(c) conviction is based on his underlying drug trafficking crime. *See* Record Document 1. This is "not a crime of violence that could implicate *Davis*." *See United States v. Olinde*, No. 03-CR-0143, 2024 WL 2834452, at *2 (M.D. La. June 4, 2024).

Accordingly, Washington's motion [Record Document 54] is **DENIED**.

THUS DONE AND SIGNED this 27th day of May, 2025.

A handwritten signature in black ink, appearing to read "S. Erny Foote", written over a horizontal line.

ELIZABETH ERNY FOOTE
UNITED STATES DISTRICT JUDGE

¹ Courts may liberally construe filings by *pro se* parties. *Grant v. Cuellar*, 59 F.3d 523, 524 (5th Cir. 1995).